

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-v-

25-MC-

\$443,332.42 UNITED STATES CURRENCY SEIZED FROM  
M&T ACCOUNT 3661,

\$97,010.26 UNITED STATES CURRENCY SEIZED FROM  
M&T ACCOUNT 3778,

\$282,923.18 UNITED STATES CURRENCY SEIZED FROM  
JP MORGAN CHASE BANK, N.A. ACCOUNT 6659,

\$150,000.00 UNITED STATES CURRENCY SEIZED FROM  
JP MORGAN CHASE BANK, N.A. ACCOUNT 3435,

\$35,747.04 UNITED STATES CURRENCY SEIZED FROM  
JP MORGAN CHASE BANK, N.A. ACCOUNT 9822, AND

\$5,431.00 UNITED STATES CURRENCY,

Defendants *in rem*.

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**STIPULATION TO EXTEND PLAINTIFF'S TIME  
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

IT IS HEREBY STIPULATED and agreed upon between and among the United States of America by its attorney, Michael DiGiacomo, United States Attorney for the Western District of New York, Melanie J. Bailey, Assistant United States Attorney, of counsel, and Paul G. Dell, Esq., of counsel, attorney for claimant Kenneth Shoemaker, II (hereinafter "the claimant"), that pursuant to Title 18, United States Code, Section 983(a)(3)(A), the government's time to file its Verified Complaint for Forfeiture against the following property be extended from July 29, 2025 to October 29, 2025:



- a. \$443,332.42 UNITED STATES CURRENCY SEIZED FROM M&T ACCOUNT 3661,
- b. \$97,010.26 UNITED STATES CURRENCY SEIZED FROM M&T ACCOUNT 3778,
- c. \$282,923.18 UNITED STATES CURRENCY SEIZED FROM JP MORGAN CHASE BANK, N.A. ACCOUNT 6659,
- d. \$150,000.00 UNITED STATES CURRENCY SEIZED FROM JP MORGAN CHASE BANK, N.A. ACCOUNT 3435,
- e. \$35,747.04 UNITED STATES CURRENCY SEIZED FROM JP MORGAN CHASE BANK, N.A. ACCOUNT 9822, AND
- f. \$5,431.00 UNITED STATES CURRENCY.

The parties to this Stipulation further agree that the claimant may revoke his consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the above-named property, and in that event, the government shall then have ten (10) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.

MICHAEL DIGIACOMO  
United States Attorney  
Western District of New York

Dated: 7/ 8 /2025

BY:

Melanie Bailey  
Melanie Bailey  
Assistant United States Attorney

Dated: 7/ 8 /2025

Paul G. Dell, Esq.  
Paul G. Dell, Esq.  
Attorney for Claimant